

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

In re: James C. Escher, aka James C. Escher, Sr. Debtor. U.S. BANK NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE FOR THE NRZ PASS-THROUGH TRUST VII (NPL) Objecting Party v. JAMES C. ESCHER, Respondent.	Bankruptcy 13-20781-jkf Chapter 13 Related to Doc. No. 185
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**RESPONSE TO MOTION FOR DETERMINATION OF FINAL CURE AND PAYMENT
TO NATIONSTAR MORTGAGE LLC**

U.S. BANK NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE FOR THE NRZ PASS-THROUGH TRUST VII (NPL) (“Secured Creditor”), by and through its undersigned attorney, hereby files its Response to Motion for Determination of Final Cure and Payment to Nationstar Mortgage LLC (“Motion”), and in support thereof states as follows:

1. James C. Escher (“Debtor”), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on December 16, 2013.
2. Secured Creditor holds an interest in Debtor’s real property located at 1167 MUHLENBERG AVE, SWARTHMORE, PA 19081.
3. Secured Creditor filed a proof of claim (Claim No. 2) on May 29, 2014 and subsequently amended on March 23, 2017 (“Claim”).

4. On December 1, 2019, Debtor filed a Motion for Determination of Final Cure and Payment to Nationstar Mortgage LLC (Doc. No. 185).
5. According to Secured Creditor's records, the Debtor is due for the March 1, 2019 post-petition payment through December 1, 2019. Please refer to the payment history attached hereto as **Exhibit A**.
6. Secured Creditor reserves the right to supplement its Response to the Motion any time before or at the hearing.

WHEREFORE, Creditor respectfully requests that this Honorable Court overrules Debtor's Motion, and for such other and further relief as the Court may deem just and proper.

Robertson, Anschutz & Schneid, P.L.

6409 Congress Ave., Suite 100

Boca Raton, FL 33487

Phone: 470-321-7112 x 221

Fax: 404-393-1425

By: /s/ Kevin Buttery

Kevin M. Buttery Esquire

Bar ID: 319438

Email: kbuttery@rascrane.com

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CERTIFICATE OF SERVICE

I certify under penalty of perjury that I served the above captioned pleadings at the addresses specified below on December 10, 2019.

The types of service made on the parties were:

By First-Class Mail:

ROGER V. ASHODIAN
Regional Bankruptcy Center of SE PA
101 West Chester Pike
Ste. 1A
Havertown, PA 19083

James C. Escher
1167 Muhlenberg Avenue
Swarthmore, PA 19081

POLLY A. LANGDON
Office of Scott F. Waterman, Trustee
2901 St. Lawrence Avenue
Suite 100
Reading, PA 19606

SCOTT F. WATERMAN (Chapter 13)
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

Robertson, Anschutz & Schneid, P.L.

6409 Congress Ave., Suite 100
Boca Raton, FL 33487
Phone: 470-321-7112 x 221
Fax: 404-393-1425

By: /s/ Kevin Buttery
Kevin M. Buttery Esquire
Bar ID: 319438
Email: kbuttery@rascrane.com